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FILE NO: 68892-000108

March 15, 2010

VIA U.S. AND ELECTRONIC MAIL

Craig Whitenack
Civil Investigator
United States Environmental Protection Agency
Region IX, Southern California Field Office
600 Wilshire Avenue, Suite 1420
Los Angeles, California 90017

Re: Response to U.S. EPA Request for Information Pursuant to Section 104(e)

of CERCLA

Yosemite Creek Superfund Site—San Francisco, California

Dear Mr. Whitenack:

Enclosed is the response prepared by Alcoa Inc. to the letter dated October 15, 2009 from James Hanson, Chief, Enforcement and Removal Operations Section, Superfund Division, U.S. Environmental Protection Agency, Region IX, to Klaus Kleinfeld, President and CEO of Alcoa Inc., regarding the Yosemite Creek Superfund Site located in San Francisco, California.

If you have any questions, please contact me.

Best regards,

Malcolm C. Weiss

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Enclosures

cc: James Hansen, U.S. EPA (w/o enclosures)

Sanford W. Harvey, Jr. (w/ enclosures)

Alcoa's Response to EPA CERCLA Section 104(e) Request for Information Yosemite Creek Superfund Site, San Francisco, California

Below is the response of Alcoa Inc., a Pennsylvania corporation with its principal office in New York, New York ("Alcoa"), to the letter dated October 15, 2009 from James Hanson, Chief, Enforcement and Removal Operations Section, Superfund Division, U.S. Environmental Protection Agency ("EPA"), Region IX, to Klaus Kleinfeld, President and CEO of Alcoa, regarding the Yosemite Creek Superfund Site located in San Francisco, California (the "Site"). EPA alleges that the Site has been impacted by the former Bay Area Drum site located at 1212 Thomas Avenue in San Francisco, California ("Bay Area Drum Site"), which is the subject of EPA's request for information. EPA's October 15, 2009 letter references Reynolds Metals Company ("Reynolds") as the "generator name." Reynolds, a wholly-owned subsidiary of Alcoa, is a Delaware corporation with its principal office in New York, New York. Alcoa acquired Reynolds in May 2000. Thus, for purposes of this response, Alcoa considers EPA's use of the term "Respondent" to include only Reynolds, its subsidiaries, divisions, affiliates, branches, and predecessors.

Alcoa believes that EPA's October 15, 2009 request for information is vague, overbroad, unduly burdensome and, in certain contexts, may exceed EPA's statutory authority under section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act, as amended ("CERCLA"). In addition, on May 22, 1992, the California Department of Toxic Substances Control ("DTSC") sent Reynolds an information request regarding its transactions with the Bay Area Drum Company. DTSC's May 22, 1992 information request is attached as Exhibit A to this response. Reynolds's June 19, 1992 response to DTSC's information request is attached as Exhibit B to this response. Because EPA's request for information covers the same subject matter as DTSC's 1992 inquiry, it is unnecessarily duplicative.¹

Alcoa has conducted an extensive search for records and information from persons and files considered most likely to have relevant information regarding EPA's request for information. EPA seeks information dating back several decades; however, Reynolds's record retention policy for documents covered by EPA's request for information has long since expired. In addition, during this time period, Reynolds sold or transferred certain entities, and as a result, relevant documents regarding the operations of such entities were transferred in the normal course of business (and therefore not retained by Reynolds) as part of such transactions. This response does not constitute a waiver of the right to object to any future, additional, or supplemental requests covering the same or similar subject matter. Nothing contained in these responses and objections is intended as, or shall in any way be deemed, a waiver by Alcoa of any applicable privilege or doctrine.

For ease of reference, EPA's numbered information requests (included as Enclosure B to its October 15, 2009 letter) are shown below in bold followed by Alcoa's response.

¹ Please note that Reynolds's 1992 response was limited to the facility known as the "San Francisco Can Plant." In 1998, two years prior to Alcoa acquiring Reynolds, Reynolds sold the former San Francisco Can Plant.

1. Describe generally the nature of the business conducted by Respondent and identify the products manufactured, formulated, or prepared by Respondent throughout its history of operations.

Alcoa is a global company operating in 31 countries that produces and manages primary aluminum, fabricated aluminum and alumina combined, through its active participation in all major aspects of the industry. Alcoa serves the aerospace, automotive, packaging, building and construction, commercial transportation and industrial markets, bringing design, engineering, production and other capabilities of Alcoa's businesses to customers. In addition to aluminum products and components including flat-rolled products, hard alloy extrusions, and forgings, Alcoa also markets Alcoa® wheels, fastening systems, precision and investment castings, and building systems.

- 2. Provide the name (or other identifier) and address of any facilities where Respondent carried out operations between 1940 and 1988 (the "Relevant Time Period") and that:
 - a. ever shipped drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal, or sale.

Reynolds San Francisco Can Plant 2425 Whipple Road Hayward, California 94540

b. are/were located in California (excluding locations where ONLY clerical/office work was performed);

Reynolds Torrance Can Plant 500 Crenshaw Boulevard Torrance, California 90509

Reynolds Torrance Extrusion Plant 2315 Dominguez Street Torrance, California 90508

Reynolds West Coast End Plant 3939 Cincinnati Avenue Rocklin, California 95677

Reynolds Aluminum Supply Company (RASCO) Fresno Facility Fresno, California Address Unknown—Closed prior to 1990

RASCO Livermore Facility 5476 Brisa Street

Livermore, California 94550

RASCO Los Angeles Facility 6446 East Washington Boulevard Los Angeles, California 90054

RASCO San Diego Facility 2300 Haffly Avenue National City, California 92050

RASCO San Francisco Facility San Francisco, California Address Unknown—Closed prior to 1990

Reynolds Aluminum Recycling Company 9910 East 6th Street Rancho Cucamonga, California 91730

Reynolds Aluminum Recycling Company 40535 Albrae Street Fremont, California 94538

Reynolds Los Angeles Recycling Center Los Angeles, California Address Unknown—Closed prior to 1990

Reynolds Sacramento Recycling Center Sacramento, California Address Unknown—Closed prior to 1990

Southern Graphics Systems ("SGS") Oakland Facility Oakland, California Address Unknown—Closed prior to 1990

Alcoa has not located or identified information or records that indicate that the facilities identified in response to Request No. 2.b. engaged in any transactions with the former Bay Area Drum Company.

c. are/were located outside of California and shipped any drums or other containers to California for recycling, cleaning, reuse, disposal, or sale (for drums and containers that were shipped to California for sale, include in your response only transactions where the drums and containers themselves were an object of the sale, not transactions where the sole object of the sale was useful product contained in a drum or other container).

Alcoa has not located or identified any documents or records responsive to Request No. 2.c. Documents within the scope of this request have been destroyed in accordance with Reynolds's document retention policy.

- 3. Provide a brief description of the nature of Respondent's operations at each Facility identified in your response to Question 2 (the "Facilities") including:
 - a. the date such operations commenced and concluded; and
 - b. the types of work performed at each location over time, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

Reynolds San Francisco Can Plant

Between 1981 and 1984, the former San Francisco Can Plant reportedly sold 1,338 empty drums to the Bay Area Drum Site. To the best of Alcoa's knowledge, the former Reynolds San Francisco Can Plant is the only Alcoa facility that had business transactions with the former Bay Area Drum Company. The former Reynolds San Francisco Can Plant manufactured aluminum beverage and wine cans by a draw and iron process. Plant operations began in 1970. In 1998, two years prior to Alcoa acquiring Reynolds, Reynolds sold its North American aluminum beverage can operations to Ball Corporation ("Ball"), which included the San Francisco Can Plant.

Reynolds Torrance Can Plant

The former Torrance Can Plant manufactured aluminum beverage cans. Plant operations began in 1966. In 1998, Reynolds sold its North American aluminum beverage can operations to Ball, which included the Torrance Can Plant.

Reynolds Torrance Extrusion Plant

The former Torrance Extrusion Plant manufactured extruded aluminum shapes and tubing and fabricated solar collector panels. Plant operations commenced in 1961 and closed in 1993 approximately 7 years before Alcoa acquired Reynolds.

Reynolds West Coast End Plant

The former West Coast End Plant manufactured aluminum can ends. Plant operations commenced in 1980. In 1998, Reynolds sold its North American aluminum beverage can operations to Ball, which included the West Coast End Plant.

Reynolds RASCO Facilities Listed in Response 2.b.

RASCO, a former division of Reynolds, provided supply chain management of aluminum, stainless steel and other specialty metals to customers located in the United States, Canada and Mexico. Integris Metals, a metals service center company that processes and distributes metals, was formed in November 2001 through the combination of RASCO and North American Metals Distribution, Inc. In January 2005, Integris Metals was sold to Ryerson Tull, Inc. Alcoa has not located or identified documents or records describing the types of work performed at the RASCO facilities indentified in Response 2.b., above.

Reynolds Recycling Centers Listed in Response 2.b.

The former Recycling Centers identified in Response 2.b., above, sorted, graded, and packaged used beverage cans. Such materials were likely sent from the recycling centers to melting and fabricating facilities located throughout the United States. In 1998, two years prior to Alcoa acquiring Reynolds, Reynolds sold its recycling centers division to Wise Recycling LLC.

SGS Oakland Facility

SGS, a former Reynolds subsidiary, provided design, pre-press, imaging and other graphic services to its customers. To the best of Alcoa's knowledge, the only SGS facility that operated in California was located in Oakland and was closed prior to 1990. In December 2005, Alcoa sold SGS to Citigroup Venture Capital Equity Partners. Alcoa has not located or identified documents or records describing the types of work performed at the former SGS facility indentified in Response 2.b., above.

4. For each Facility, describe the types of records regarding the storage, production, purchasing, and use of Substances of Interest ("SOI") during the Relevant Time Period that still exist and the periods of time covered by each type of record.

EPA's "Information Request Definitions," in its October 15, 2009 request for information, defines "Substance of Interest" or "SOI" as all contaminants of concern ("COC"), which include lead, zinc, mercury, dichlorodiphenyltrichloroethane ("DDT"), chlordane, dieldrin, and polychlorinated biphenyls ("PCBs"), as well as, hydraulic oils and transformer oils.

Reynolds San Francisco Can Plant

Alcoa has not identified any documents or records indicating that the former Reynolds San Francisco Can Plant stored, produced or purchased any SOI during the Relevant Time Period.

Reynolds Torrance Can Plant

Alcoa has not identified any documents or records indicating that the former Reynolds Torrance Can Can Plant stored, produced or purchased any SOI during the Relevant Time Period.

Reynolds Torrance Extrusion Plant

Alcoa has not identified any documents or records indicating that the former Reynolds Torrance Extrusion Plant stored, produced or purchased any SOI during the Relevant Time Period.

Reynolds West Coast End Plant

Alcoa has not identified any documents or records indicating that the former Reynolds West Coast End Plant stored, produced or purchased any SOI during the Relevant Time Period.

Reynolds RASCO Facilities Listed in Response 2.b.

Alcoa has not identified any documents or records indicating that the former Reynolds RASCO facilities listed in Response 2.b., above, stored, produced or purchased any SOI during the Relevant Time Period.

Reynolds Recycling Centers Listed in Response 2.b.

Alcoa has not identified any documents or records indicating that the former Reynolds Recycling Centers listed in Response 2.b., above, stored, produced or purchased any SOI during the Relevant Time Period.

SGS Oakland Facility

Alcoa has not identified any documents or records indicating that the former SGS facility located in Oakland, California stored, produced or purchased any SOI during the Relevant Time Period.

5. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use, or store one of the COCs (including any substances or wastes containing the COCs) at any of the Facilities? State the factual basis for your response.

EPA's "Information Request Definitions," in its October 15, 2009 request for information, defines the term "COC" as lead, zinc, mercury, DDT, chlordane, dieldrin, and PCBs.

Reynolds San Francisco Can Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds San Francisco Can Plant produced, purchased, used or stored any COC's.

Reynolds Torrance Can Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds Torrance Can Plant produced, purchased, used or stored any COC's.

Reynolds Torrance Extrusion Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds Torrance Extrusion Plant produced, purchased, used or stored any COC's.

Reynolds West Coast End Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds West Coast End Plant produced, purchased, used or stored any COC's.

Reynolds RASCO Facilities Listed in Response 2.b.

Alcoa has not located or identified any documents or records indicating that the former Reynolds RASCO facilities listed in Response 2.b., above, produced, purchased, used or stored any COC's.

Reynolds Recycling Centers Listed in Response 2.b.

Alcoa has not located or identified any documents or records indicating that the former Reynolds Recycling Centers listed in Response 2.b., above, produced, purchased, used or stored any COC's.

SGS Oakland Facility

Alcoa has not located or identified any documents or records indicating that the former SGS facility located in Oakland, California produced, purchased, used or stored any COC's.

6. If the answer to Question 5 is yes, identify each COC produced, purchased, used, or stored at each Facility.

Not applicable.

7. If the answer to Question 5 is yes, identify the time period during which each COC was produced, purchased, used, or stored at each Facility.

Not applicable.

8. If the answer to Question 5 is yes, identify the average annual quantity of each COC produced, purchased, used, or stored at each Facility.

Not applicable.

9. If the answer to Question 5 is yes, identify the volume of each COC disposed by the Facility annually and describe the method and location of disposal.

Not applicable.

10. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use, or store hydraulic oil or transformer oil at any of the Facilities? State the factual basis for your response to this question.

Reynolds San Francisco Can Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds San Francisco Can Plant produced, used, or stored any hydraulic oil or transformer oil. According to Reynolds's June 19, 1992 response letter to DTSC (attached as Exhibit B to this response), prior to the drums being emptied, cleaned and sold to the Bay Area Drum Company, such drums contained petroleum-based process and lubrication oils.

Reynolds Torrance Can Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds Torrance Can Plant produced, used, or stored any hydraulic oil or transformer oil.

Reynolds Torrance Extrusion Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds Torrance Extrusion Plant produced, used, or stored any hydraulic oil or transformer oil.

Reynolds West Coast End Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds West Coast End Plant produced, used, or stored any hydraulic oil or transformer oil.

Reynolds RASCO Facilities Listed in Response 2.b.

Alcoa has not located or identified any documents or records indicating that the former Reynolds RASCO facilities listed in Response 2.b., above, produced, used, or stored any hydraulic oil or transformer oil.

Reynolds Recycling Centers Listed in Response 2.b.

Alcoa has not located or identified any documents or records indicating that the former Reynolds Recycling Centers listed in Response 2.b., above, produced, used, or stored any hydraulic oil or transformer oil.

SGS Oakland Facility

Alcoa has not located or identified any documents or records indicating that the former SGS facility located in Oakland, California produced, used, or stored any hydraulic oil or transformer oil.

11. If the answer to Question 10 is yes, identify each specific type of hydraulic oil and transformer oil produced, purchased, used, or stored at each Facility.

Not applicable.

12. If the answer to Question 10 is yes, identify the time period during which each type of hydraulic oil and transformer oil was produced, purchased, used, or stored.

Not applicable.

13. If the answer to Question 10 is yes, identify the average annual quantity of each type hydraulic oil and transformer oil purchased, produced, used, or stored at each Facility.

Not applicable.

14. If the answer to Question 10 is yes, identify the volume of each hydraulic oil and transformer oil disposed by the Facility annually and describe the method and location of disposal.

Not applicable.

- 15. Provide the following information for each SOI (SOIs include any substance or waste containing the SOI) identified in your responses to Questions 5 and 10:
 - a. Describe briefly the purpose for which each SOI was used at the Facility. If there was more than one use, describe each use and the time period for each use;

- b. Identify the supplier(s) of the SOIs and the time period during which they supplied the SOIs, and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks and other documents pertaining to the procurement of the SOI;
- c. State whether the SOIs were delivered to the Facility in bulk or in closed containers, and describe any changes in the method of delivery over time;
- d. Describe how, where, when, and by whom the containers used to store the SOIs (or in which the SOIs were purchased) were cleaned, removed from the Facility, and/or disposed of, and describe any changes in cleaning, removal, or disposal practices over time.

Not applicable. See response to Request No. 4, above.

- 16. For each SOI delivered to the Facilities in closed containers, describe the containers, including but not limited to:
 - a. the type of container (e.g. 55 gal. drum, tote, etc.);
 - b. whether the containers were new or used; and
 - c. if the containers were used, a description of the prior use of the container.

Not applicable. See response to Request No. 4, above.

17. For each container that Respondent used to store a SOI or in which SOIs were purchased ("Substance-Holding Containers" or "SHCs") that was later removed from the Facility, provide a complete description of where the SHCs were sent and the circumstances under which the SHCs were removed from the Facility. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Not applicable. To the best of Alcoa's knowledge, no SOI's were produced, used, or stored at the facilities identified in response to Request No. 2, above. Thus, Alcoa does not believe that any such facilities used any SHC's.

18. For each SHC that was removed from the Facility, describe Respondent's contracts, agreements, or other arrangements under which SHCs were removed from the Facility, and identity all parties to each contract, agreement, or other arrangement described. Distinguish between the Relevant Time Period and the time period since 1988.

Not applicable. See response to Request No. 17, above.

19. For each SHC, provide a complete explanation regarding the ownership of the SHC prior to delivery, while onsite, and after it was removed from the Facility. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Not applicable. See response to Request No. 17, above.

20. Identify all individuals who currently have, and those who have had, responsibility for procurement of Materials at the Facilities. Also provide each individual's job title, duties, dates performing those duties, current position or the date of the individual's resignation, and the nature of the information possessed by each individual concerning Respondent's procurement of Materials.

Alcoa has not located or identified any documents or records responsive to Request No. 20.

- 21. Describe how each type of waste containing any SOIs was collected and stored at the Facilities prior to disposal/recycling/sale/transport, including:
 - a. the type of container in which each type of waste was placed/stored;
 - b. how frequently each type of waste was removed from the Facility; Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Not applicable. See responses to Request Nos. 4 and 17, above.

- 22. Describe the containers used to remove each type of waste containing any SOIs from the Facilities, including but not limited to:
 - a. the type of container (e.g. 55 gal. drum, dumpster, etc.);
 - b. the colors of the containers:
 - c. any distinctive stripes or other markings on those containers;
 - d. any labels or writing on those containers (including the content of those labels);
 - e. whether those containers were new or used; and
 - f. if those containers were used, a description of the prior use of the container; Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Not applicable. See responses to Request Nos. 4 and 17, above.

23. For each type of waste generated at the Facilities that contained any of the SOIs, describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling and identify all parties to each contract, agreement, or other arrangement described. State the ownership of waste containers as specified under each contract, agreement, or other arrangement described and the ultimate destination or use for such containers. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Not applicable. See response to Request No. 4, above.

24. Identify all individuals who currently have, and those who have had, responsibility for Respondents environmental matters (including responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes and SHCs). Provide the job title, duties, dates performing those duties, supervisors for those duties, current

position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

To the best of Alcoa's knowledge, only the San Francisco Can Plant sold empty and clean drums to the Bay Area Drum Site. Attached as <u>Exhibit C</u> to this response is a list of all Alcoa employees that, to the best of Alcoa's knowledge, have, or previously had, responsibility for environmental matters at Reynolds's facilities located in the United States.

25. Did Respondent ever purchase drums or other containers from a drum recycler or drum reconditioner? If yes, identify the entities or individuals from which Respondent acquired such drums or containers.

Alcoa has not located or identified documents or records responsive to Request No. 25.

26. Prior to 1988, did Respondent always keep its waste streams that contained SOIs separate from its other waste streams?

Not applicable. See response to Request No. 4, above.

27. Identify all removal and remedial actions conducted pursuant to the Comprehensive Environmental Response, Compensation and Liability Act, 42, U.S.C. § 9601 et seq., or comparable state law; all corrective actions conducted pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq.; and all cleanups conducted pursuant to the Toxic Substances Control Act, 15 U.S.C. § 2601 et seq. where (a) one of the COCs was addressed by the cleanup and (b) at which Respondent paid a portion of cleanup costs or performed work. Provide copies of all correspondence between Respondent and any federal or state government agency that (a) identifies a COC and (b) is related to one of the above-mentioned sites.

Alcoa has not located or identified documents or records responsive to Request No. 27.

28. Provide all records of communication between Respondent and Bay Area Drum Company, Inc.; Meyers Drum Company; A.W. Sorich Bucket and Drum Company; Waymire Drum Company, Inc.; Waymire Drum and Barrel Company, Inc.; Bedini Barrels Inc.; Bedini Steel Drum Corp.; Bedini Drum; or any other person or entity that owned or operated the facility located at 1212 Thomas Avenue, in the City and County of San Francisco, California.

Alcoa has not located or identified documents or records responsive to Request No. 28.

29. Identify the time periods regarding which Respondent does not have any records regarding the SOIs that were produced, purchased, used, or stored at the Facilities.

Not applicable. See response to Request No. 4, above.

30. Provide copies of <u>all documents</u> containing information responsive to the previous twenty-nine questions and identify the questions to which each document is responsive.

Attached as $\underline{\text{Exhibit D}}$ to this response are copies of all documents responsive to EPA's request for information. These documents date back to the early 1980s and would normally be destroyed in accordance with Reynolds's document retention policy. However, they have been retained as part of the file related to DTSC's 1992 inquiry.

Alcoa believes these responses, including the exhibits hereto, are responsive to EPA's request for information. Alcoa would be pleased to assist you further, if necessary.

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2 700 HEINZ AVE., SUITE 200 BERKELEY, CA 94710-2737

May 22, 1992





Mike Gilbert Administrative Manager Reynolds Metals Company 2425 Whipple Rd. Hayward, CA 94540

Dear Mr. Gilbert:

This letter is to request information regarding Reynolds Metals Company's past business relationship with the Bay Area Drum Company (BADC) that operated at 1212 Thomas Avenue, San Francisco. Our records indicate that Reynolds Metals Company sent drums to the BADC site. The purpose of this letter is to request information from companies who did business with the Bay Area Drum Company to obtain information regarding the type and quantity of hazardous substances that were sent to the BADC site.

The Department is interested in the nature of transactions between Reynolds Metals Company and BADC. Please answer the following questions as specifically as possible:

- 1) The approximate number of drums shipped to BADC between 1948 through 1987.
- 2) The nature of the substances contained in subject drums
- 3) The type and capacity of each drum
- 4) The disposition of subject drums after the substances were used
- 5) The residual level in each drum after they were shipped offsite
- 6) Methods used to determine the residual levels in each drum
- 7) Were drums sent to the BADC for reconditioning?
- 8) Were drums sent to the BADC for disposal?

Please provide responses to the aforementioned questions within thirty (30) days of the date of this letter. Compliance with the information request set forth is mandatory pursuant to sections 25185.6, 25358.1 and 25358.3 of the California Health and Safety Code. Failure to respond fully and truthfully to the information request may result in enforcement action by the Department, subject to

the penalties allowed under Sections 25189, 25189.2, 25191 and 25367 of the Health and Safety Code. The penalty provided is up to \$25,000 for each violation and up to \$25,000 per day for each day that the violation continues. Please be further advised that provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties.

Please send your response to: Moni

Monica Gan Cal-EPA, Dept. of Toxic Substances Control 700 Heinz Ave. Bldg. F Berkeley, CA 94710

I can be contacted at (510) 540-3767 if you have any questions regarding this matter.

Sincerely,

monica Gen

Monica Gan, Staff Services Analyst Site Mitigation Branch

cc: Susan Bertken
Senior Staff Attorney
Dept. of Toxic Substances Control
P.O. Box 806,
Sacramento, CA 95814



REYNOLDS METALS COMPANY

6601 W. BROAD STREET • RICHMOND, VIRGINIA 23230-1701 MAILING ADDRESS: P.O. BOX 27003 • RICHMOND, VIRGINIA 23261-7003

LAW DEPARTMENT

TELEX: 442-7015 REYLAW TELECOPY: (604)281-3740 CABLE: REYMETCO

Tel. (804) 281-4753

VIA DHL WORLDWIDE

June 19, 1992

Ms. Monica Gan Cal-EPA, Department of Toxic Substances Control 700 Heinz Avenue, Building F Berkeley, CA 94710

RE: Bay Area Drum Company ("BADC")

Dear Ms. Gan:

This letter is in response to your letter to Mike Gilbert of Reynolds Metals Company ("Reynolds") dated May 22, 1992, in which you requested certain information concerning the above-named site.

Reynolds is interested in cooperating with both the Cal-EPA and with the other potentially responsible parties regarding the proposed actions for the Site. This willingness to cooperate, however, should not be taken as an admission of liability or responsibility regarding the site.

Please direct future correspondence on this matter directly to me at the following address:

James E. McKinnon, Esquire Reynolds Metals Company 6601 West Broad Street Richmond, Virginia 23230

The following is Reynolds' response to the Department's request for information. Reynolds has limited its response to its San Francisco Can Plant ("the plant"), 2425 Whipple Road, Hayward, CA 94540.

Ms. Monica Gan Page 2 June 19, 1992

Ouestion 1: The approximate number of drums shipped to BADC between 1948 through 1987.

Answer 1: Reynolds' documents indicate 1,328 drums were purchased and transported by BADC. Reynolds has no knowledge if these drums were delivered to the Site.

<u>Ouestion 2</u>: The nature of the substances contained in subject drums.

Answer 2: Reynolds sold empty drums to BADC. Prior to the drums being emptied, they most likely contained petroleum-based process and lubrication oils or a washer solution containing a diluted solution of either sulfuric or hydrofluoric acid.

Question 3: The type and capacity of each drum.

Answer 3: The capacity of each of the drums was 55 gallons.

According to the attached documents, the type of drums were scrap lined drums, scrap unlined drums, and scrap plastic drums.

Ouestion 4: The disposition of subject drums after substances were used.

Answer 4: In general, as much of the substances as possible were removed from the drums. The drums were stored from approximately 30-120 days in the drum yard. The drum yard was outside the plant, but within the plant property boundaries.

<u>Ouestion 5</u>: The residual level in each drum after they were shipped offsite.

Answer 5: Reynolds emptied the drums as much as possible of all substances. One current employee recalls that BADC would not buy any drums from Reynolds with any liquids in the drums.

<u>Ouestion 6</u>: Methods used to determine the residual levels in each drum.

Answer 6: Reynolds visually determined that the drums were empty.

Alcoa Response to EPA CERCLA 104(e) Request Letter - Yosemite Creek Superfund Site Exhibit C - Response to Request No. 24 (Environmental Employees)

Name	Start Date	End Date	Title	Location
Ashe,Richard D	5/2/1966	Unknown	Environmental Supv.	Benton Harbor, MI
Asp,William F	3/1/1966	3/31/2000	Environmental Coord.	Downingtown, PA
Balge,John W	1/13/1975	Unknown	Envirl Coord	Milwaukee Can Plant
Ballou,Thomas B	7/1/1991	Unknown	Env. Quality Supt.	Unknown
Beard,Robert A	2/13/1980	Unknown	Env/Health/Saf Mgr	Bellwood Printing
Benoit, Vaughn A	12/1/1983	3/31/2002	Process Eng/Env.Rep	Baton Rouge, Louisiana
Bertonneau,Brian D	10/25/1993	11/30/2000	Envrnmntl Attorney	Richmond, Virginia
Boak,William W	9/15/1980	Unknown	Env.Compliance Facil	Massena, New York
Boehler, Jeffery A	4/1/1981	8/9/1998	Envirl Control Mgr	Reidsville Can Plant
Bonty,Randall W	10/10/1988	Unknown	Wwt/Envir. Supv.	Monticello Can Plant
Bosserman,Lisa L	4/1/1995	Unknown	Pltsftyenvirlcoord	Louisville, Kentucky
Brewer,Brenda J	10/16/1995	3/20/1998	Pltsftyenvirlcoord	Louisville, Kentucky
Broocke,David C	5/13/1996	Unknown	Env/Reg Affairs Mgr	Richmond, Virginia
Brooks, Dennis G	12/16/1981	9/29/2000	Mtrl/Envir Techy Mgr	Knoxville, Tennessee
Carlisle,Joplin Riley	5/15/1990	Unknown	Environmental And Sa	Unknown
Childress, Allen Bruce	9/18/1989	Unknown	Enviornmental Safety	Unknown
Coleman,Laura A	9/13/1993	Unknown	Env/Hlth/Safety Mgr	Knoxville, Tennessee
Deckert, Camille Ferreri	6/17/1991	7/7/2006	Env.Health & Saf.Spe	Richmond, Virginia
Diiorio, Anthony	6/14/1965	Unknown	Area Envirl Manager	Richmond, Virginia
Dott,David G	5/3/1993	Unknown	Envirl Engr	Louisville, Kentucky
Felling,Gregory	6/4/1973	Unknown	Env/Tech Coordinator	Texarcana, Texas
Gieseking,Randall A	8/28/1995	Unknown	Reg Envir/Safety Mgr	Auburn Extrusion Plant
Grover,Patrick F	4/20/1992	Unknown	Environmental Mgr	Richmond, Virginia
Hall,Robert M	5/1/1986	Unknown	Div Envirl Mgr (Wc)	Unknown
Hansen, James L.	12/9/1996	12/3/2001	Enviro Engr/Superv	Beliot, Wisconsin
Hoskins,Lori J.	8/27/1990	6/30/1997	Div Env& Ind Hyg Mgr	Richmond, Virginia
Hunt,Robert A	10/1/1987	4/14/2000	Env/Hlth/Safety Mgr	Richmond, Virginia
Hunter,Jason	5/3/1996	Unknown	Rcb - Denver West	Unknown
Johnson,Donald L	9/16/1980	Unknown	Envirl Coord	Torrance, California
Johnson,Paul B	7/25/1988	3/31/1999	Mgr/Environ Svc	Unknown
Lenney,Robert J	6/23/1987	8/31/2001	Mgr,Remediation Strg	Reydarfjordur, Iceland
Mace, Timothy R	10/15/1973	2/26/2001	Env. Engineer	Longview, Washington
Mckinnon, James E	6/17/1985	1/15/2001	Chief Envirl Counsel	Richmond, Virginia
Mcmaster, Wesley C	4/16/1993	Unknown	Environ Technologist	Texarcana, Texas
Medellin,Jose P	7/29/1974	Unknown	Environ. Specialist	Unknown

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Alcoa Response to EPA CERCLA 104(e) Request Letter - Yosemite Creek Superfund Site Exhibit C - Response to Request No. 24 (Environmental Employees)

Name	Start Date	End Date	Title	Location
Mitchell,Jerry F	10/16/1968	3/31/1999	Qlt/Saf/Env Assr Mrg	Muscle Shoals, Alabama
Mittiga,Roy F	7/13/1988	Unknown	Env.Srv. Lead Suprv.	Massena, New York
Moore, Timothy N	12/29/1997	8/13/1999	Env. Control Supv.	Troutdale, Oregon ·
Murphy-Wimmer, Vicky	3/4/1991	12/31/2002	Env.Srv. Flow Leader	Massena, New York
Nadermann, Kristin K	6/24/1991	4/13/2001	Environ & Lab Mgr	Unknown
Nealis, Gregory L	5/18/1981	Unknown	Div Mgr Envir/Saf/Hy	Kansas City Can Plant
Neff,Michelle C	9/21/1992	3/16/1997	Ind Eng/Env Coord	Asheville Plant
Olive,Ronald G	3/15/1974	3/31/1999	Environ Control Mgr	Muscle Shoals, Alabama
Parent, Jordan J	5/16/1996	Unknown	Environ Engineer	Massena, New York
Parker,Leo W	7/29/1974	Unknown	Envirl/Tpm Engr	Richmond, Virginia
Pongetti, David	5/23/1966	Unknown	Mgr. Of Environ. Ser	Muscle Shoals, Alabama
Poole,Paula K.	6/18/1990	Unknown	Plt. Environmental	Lake Charles, Louisiana
Radtke,Cindy H	8/16/1979	3/31/1999	Environ Control Mgr	Unknown
Sandoval, Antonio A	6/14/1976	11/15/2000	Env.Control Supv	Troutdale, Oregon
Schon,James E	9/9/1999	Unknown	Environmental Mgr	Ferndale, Washington
Scott,Sheila D	4/16/1991	Unknown	Environmental Engr	Unknown
Shepherd,D Lyn	8/1/1979	Unknown	Envir/Tech Coord	Arkadelphia, Arkansas
Taylor,Cathy C	2/8/1988	10/31/2000	Corp Dir Environment	Richmond, Virginia
Thomas,T. Kent	12/20/1993	Unknown	Env Compliance Facil	Unknown
Tolin, Michael J	7/1/1995	9/29/2002	Env.Hlth.& Sfty. Mgr	Louisville, Kentucky
Tropea,Lawrence C	3/1/1973	Unknown	Corp Dir Environment	Unknown
Truitt, Timothy J.	3/12/1996	3/31/1999	Environ Control Mgr	Unknown
Veasey, Theresa L	1/1/1995	7/31/1998	Envrl Hlth Safty Mgr	Louisville, Kentucky
Wacaser, Marion E	12/1/1992	Unknown	Reg Coord Env/Saf/Hy	Tampa, Florida
Weissinger, Thomas R.	6/13/1996	Unknown	Lab & Envirl Mgr	Massena, New York
Whitaker,Beverly Y	1/1/1990	Unknown	Indust Nurse A/Env &	Unknown
Whitley, Terry H	5/21/1979	Unknown	Safety & Environment	Hot Springs, Arkansas
Whittaker,Shaun L	5/20/1996	5/11/1997	Environmental Specia	Unknown
Meleason, Timothy J	10/02/98	12/21/01	Environ Area Team Ldr Ii	Richmond, Virginia
Argento, Nicholas F	08/26/02	02/28/03	Multi EHS Staff Assoc Engr	Rogers, Minnesota
Bausman, Damian	01/02/03	05/14/05	Multi EHS Staff Assoc Engr	Visalia, California

Alcoa Response to EPA CERCLA 104(e) Request Letter - Yosemite Creek Superfund Site Exhibit C - Response to Request No. 24 (Environmental Employees)

Name	Start Date	End Date	Title	Location
Ferguson,Benjamin J	03/26/01	02/01/04	Multi EHS Staff Assoc Engr	Rogers, Minnesota
Johnson, Thurl D	09/11/00	10/16/04	Multi EHS Staff Assoc Engr	Visalia, California
Kauffman, Tracey	09/20/06	03/07/08	Multi EHS Mgr	Wakefield, Massachusetts
Lanie,Patrick E	08/18/86	07/01/06	Multi EHS Process Ldr II	Grant Park, Illinois
Leafty,Gary L	09/02/97	01/31/07	Multi EHS Tech II	Sparks, Nevada
Lueth,Patrick Schwan	01/03/00	12/14/05	Multi EHS Process Ldr II	Grant Park, Illinois
Plehal, Joseph A	04/23/07	03/01/08	Multi EHS Process Ldr II	Rogers, Minnesota
Brown,James C	10/24/77	07/01/02	Sr Staff Environ Engineer	Richmond, Virginia
Klatt,Robert A	05/01/83	01/01/08	Multi EHS Staff Assoc Engr	Ewa Beach, HI
Patel, Anil U	12/01/83	12/21/01	Sr Staff Environ Engineer	Richmond, Virginia
Adey, Michelle L	11/01/98	Unknown	Professional	Massena, New York
Alawami, Saeed	01/09/06	11/15/06	Associate Team Leader	Louisville, Kentucky
Anderson, Mary G	12/01/83	Unknown	Team Leader	Lake Charles, Louisiana
Benoit, Vaughn A	12/01/83	Unknown	Process Leader	Baton Rouge, Louisiana
Boak, William W	05/01/89	Unknown	Senior Professional	Massena, New York
Gee, Brandi R.	05/10/04	Unknown	Associate Professional	Louisville, Kentucky
Golden, Rebecca J	03/29/93	Unknown	Senior Technician	Arkadelphia, AR
Grover, Patrick F	04/20/92	Unknown	Senior Staff Manager	Richmond, Virginia
Hansen, Brent T	12/01/97	Unknown	Associate Professional	Massena, New York
Helgerman, William A	10/11/71	Unknown	Specialist	Richmond, Virginia
Hertzog, Dustin G	05/17/04	Unknown	Professional	Downingtown, PA
Lavine, Ted W	07/12/93	Unknown	Process Leader	Massena, New York
Long, Timothy P	07/01/98	Unknown	Process Leader	Massena, New York
Mittiga, Roy F	05/01/90	Unknown	Process Leader	Massena, New York
Murphy-Wimmer, Vicky L	03/04/91	Unknown	Staff Supervisor	Massena, New York
Padgett, Bobby J	01/01/96	Unknown	Staff Supervisor	Lake Charles, Louisiana
Parent, Jordan J	05/26/98	Unknown	Staff Supervisor	Massena, New York
Poole, Paula K	06/18/90	Unknown	Senior Professional	Lake Charles, Louisiana
Rade, Irving H	12/10/07	Unknown	Staff Supervisor	Lake Charles, Louisiana
Shelby, Laurie M	01/20/00	09/28/09	Senior Consultant	Richmond, Virginia Metals
Stoneberger, Michael W	01/23/02	Unknown	Process Leader	Richmond, Virginia
Strain, William C	01/15/64	Unknown	Staff Manager	Richmond, Virginia
Thomas, T Kent	12/20/93	Unknown	Professional	Arkadelphia, AR
Tolin, Michael J	07/01/95	Unknown	Senior Professional	Louisville, Kentucky
Hansen, James L	12/09/96	Unknown	Professional	Beloit, Wisconsin

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EXHIBIT D







San Francisco Can Plant

FROM: Mike Gilbert

TO: Bob Ball - Torrance Can Plt

COPY: V. Taylor - CDHQ, C. Boatwright - E-L-3,

R. Winston, K. Beal - S.F. Can Plt

DATE & SUBJECT: 6-9-92 Bay Area Drum Site - Disposed Drums

As a follow-up to my memo of 6-6-92 regarding subject site investigation, please find below in-plant record history of RMC San Francisco Can Plt shipments of disposed drums to subject site. Also, please find attached MSO documentation for support of each shipment.

Please know below shipments represent a record search from January 1981 through December 1987. Plant records prior to 1981 have been destroyed per Corporate Record Retention Destruct Lists, and therefore, not available.

Bay Area Drum records from 1978 through 1987 are available at the Department of Toxic Substances Control.

Ship Date	Misc Ship Order #	Drum Amt

01-26-81	CNX-54-5691	70
07-31-81	CNK-54-5918	188
08-28-81	CNK-54-5947	148
11-13-81	CNK-54-6060	180
03-11-82	CNK-54-6209	131
05-17-82	CNK-54-6310	155
06-23-82	CNK-54-6368	99
10-11-82	CNK-54-6508	84
03-01-83	CNK-54-6671	47
08-30-83	CNK-54-6975	75
11-29-84	CNK-54-7828	150

The total amount of drums shipped during this period equals 1,328.

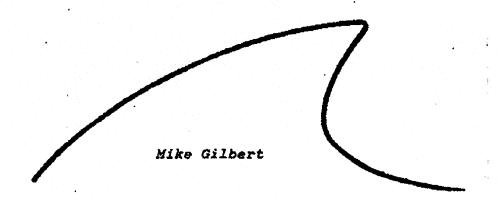
Please know information concerning the type of residue materials in the drums is not ascertainable on MSO documentation.

Given the consistency of shipments in 1981 and 1982, drums were probably shipped to subject site prior to 1981.

Please know the State has requested I turn over all information on file regarding shipments to the site from 1948 through 1987. Please find attached letter. The deadline date for submittal is June 21, 1992.

Please advise next plan of action.

Thank you.



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	RECIEVED REA	The second secon		Larger (Silver)		* **	
	NOTE: MAKE CHECK F	AYABLE TO:	REYNOLDS	METALS CO			
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			JH	0 -	DATE SH	HODEN	***
		CARRIER N	Section Control	WELL !		1–11–13	* ***
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SALE OF SCRAP DI	MINE .	Treat Cubito				*	
		and the second second	ACCOUNT NO	OMA	INVOICE	NO. 1"	19
PECIAL INSTRUCTIONS				The state of the s	INVOIC	E DATE	*
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COMPLETE OFON O		_	25.77		DEBIT A	AEMO NO.	RECG.
APPROVED BY (PURCH, AGE	MI CONTRACTOR OF THE PROPERTY	the file house of the least	COLLEGE CONTRACTOR OF THE STATE		7 7	a, ****** ***.	1
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L. ROGERS	Bergine kirkir di Bergine kirkir di		AND THE WAY		į		

(C)	BAN FR	NOLDS MET NCISCO CAN PLAN- HIPPLE ROAD CA. 94540	La Company of the Company		III M.S.C	SCELLANEOUS SHAW NO. NO.	DATE
Y A	REA DRUM		SHIP TO		A SECTION	ORDER NO.	OUR P.O. NO. N/A
:12 N F	THOMAS AVE	9412411			F.O.B.	10.71.0	☐ PREPAID
3 2 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4					CUS	ESTING DEPT.	29 COLLECT
EM.	QUANTITY		DESCRIPTION		N. Stories	UNIT	TOTAL AMOL
		BALE OF PLASTIC	ACT 2 DRUMS, S	CRAP STATE		\$5.00/ea	\$85.00
2	114 es	SALE OF LINED D	RUMS, SCRAP			\$1.50 TOTAL 7	\$171.00 \$256.00
		RECIEVED BY NOTE: MAKE CHEC	K PAYABLE TO:				
				2425 WHIPPLE HAYWARD, & CA.	ROAD		
				ALTERNATION OF THE PROPERTY OF			
1	FOR SHIPMENT	rs	CARRIER CUSTON	ERS TRUCK		E SHIPPED 82_03_11 OF LADINO NO.	
	LINSTRUCTIONS LETE UPON SHI	PMENT	08.	ACCOUNT NO.	T _k Neg	OICE NO.	······································
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7, L	VED BY (PURCH, AGENT KUSKUS ROGURS						A A
322-19	(t) (REV. \$1-45)			San			

21	6an Frai 2425 Will Hayward	NOLDS MEZ NCISCO CAN PLAN IPPLE ROAD CA. 94540	The same of the same	PANY		MISCELLANE TAW MIS.O. NO. CNIK-54-631 CUST. ORDER NO		DATE: 82-05-1 OUR P.O. NO.
-	TURNED TO, PURCH	ASED FROM	SHIP TO			4 14 14 14 14 14 14 14 14 14 14 14 14 14		· N/A
	EA DRUM HOMAS AVE.					TERMS		CREDIT
SAN FR	ANCISCO, CA	. 941244				F.O.B. 4		
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्रत्यक्षेत्रसम्बद्धाः वर्णन्त्रे च					伊斯等。华	CUST TRU		PREPAID COLLECT
was restrace						REQUESTING DEP		* · A ;
* *						the state of the s	<u>H</u>	2, 4
ITEM NO.	QUANTITY S.		DESCRIPTION	HIVE THE STATE OF		PAK		TOTAL AMC
1 2.	54 ea	SALE OF UNLINED	RAP DRUMS			\$5.00 \$1.50	0/es 0 es	\$270. \$147. \$ 10.
3	4 es	BALE OF PLASTIC				\$2.50 TOTAL	5 3 m - 5 m	\$ 7X8 \$427.
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					10			
		RECIEVED BY	Tod 14		4			
		NOTE: MAKE CHEC	K PAYABLE TO:	HEYNOLDS MET 2425 WHIPPLE HAYWARD, & CA	ROAD			
			A CHECK #2334			DATE SHIPPED		
	OR SHIPMENT F SCRAP DRU		CUS	TOMERS TRUCK		. 8	5-17 NO.	
1	ETRUCTIONS .			ACCOUNT NO.	. AMOUNT	INVOICE NO.		*
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	BY (PURCH, AGENT					DEBIT MEMO N	Ю.	RECG. REPORT
Ulm	flul			ar			*	*
D.F. 6	IILSON			and the second second			er i n i y ie p	

BAY AREA DRUM CO. Inc.

Drums Bought, Sold and Reconditioned

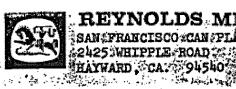
1212 THOMAS	AVENUE SAN FRANCISCO, CA 94124	PHONE: (415	822-3955
	ED INVENTORY	Nº	0235
Received from Address	REHOLDS NIETAL	راح	13 - Marie
Acct. of:			S & collection over 1 gags.
GUANTITY.	DESCRIPTION	7 .	
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2.7	55 GAL. = 2 OIL TOP BUNG		2000
	55 GAL. DEHE SERS SHORT	· · · · · · · · · · · · · · · · · · ·	
	55 GAL, DEHEADERS TALL	*** # # 5469	روون بالمهداد
	55 GAL JUNKERS		····
•	55 GAL. F.O.T. L.L. TALL	and graphing of all talk the - manager of the	1846
**************************************	55 GAL. F.O.T. L.L. SHORT		· · · · · · · · · · · · · · · · · · ·
**************************************	55 GAL. F.O.T. 17H		
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* 9000000000000000000000000000000000000	55 GAL. F.O.T. BOLT TALL		
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*	55 GAL. F.O.T. ADG.		
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	30 GAL. OIL DEHEADERS	(1)	
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	30 GAL F.O.T. LL.	The state of the s	1sto

TOTAL

E	SAN FE	NOLDS METALS C	OMPANY	\4ISCE	LLANEOUS SH	IIPPING OF
BAY	HAYWAF TO, RETURNED TO, PURC AREA DRUM			M.S.O. NO CINK SIL CUST. ORE	-6368	B2_D6_2 OUR P.O. N N/A CREDIT
San	FRANCISCO, CA	94124		SHIP VIA CUST REQUESTIN	S.P. IG DEPT. LD HOLLENS	PREPAIN ZOLLEC
ITEM NO.	QUANTITY COM	A STATE OF THE SECOND S	SCRIPTION 2	3 5. 33	UNIT	NA JATOT
1	12 ea	SALE OF UNLINED DRUMS		\$	5.00	\$60.0
2	87 ea	SALE OF LINED DRUMS			1.50/ea PAL	\$130.5 \$190.5
A A A A A A A A A A A A A A A A A A A		NOTE: MAKE: CHECK PAYABLE T	2425 WHIPPLE BOAD			e e e e e e e e e e e e e e e e e e e
			HAYWARD, CA. 94540	**************************************	4	N c
		RECIEVED N	100-110-			
		(((PAID BY CHECK: #24				
	OF SCRAP DRUM	CARRIER	对话,我们们也没有不知识,我们就是一个人的,我们也没有这样的。""这么,"	DATE SHIPF BILL OPTAB	Kofilo.	*
SPECIA	LINSTRUCTIONS	IEWT DR.	ACCOUNT NO. AMOUNT	INVOICE D	ATE	
-0	FORSTROM	7		DEBIT MEM	IO NO. System RI	ICO. REPORT

K	REYI	NOLDS MEX ANCISCO CAN PL HIPPLE ROAD	ALS COMP	ANY-		MISCEL	LANEOUS SH	IPPING ORDE
22	2425 W HAYWAR	D, CA. 94540		The second problems with a second sec		.S.O. NO.	4-6505	DATE 10-11-82
co to	, RETURNED TO, PURC	,	SHP TO			UST. ORD	R NO.	OUR P.O. HO. N/A
	area drum sai		and the first of the second of			ERMS		CREDIT
27.0	THOMAS AVE					,О.В.	s.P.	L
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9		The state of the s	The second secon			CUST TREQUESTIN	TRUCK IG DEPT.	X COLLECT
	La Maria			A STATE OF THE STA		. k	UNIT	TOTAL AMC
ITEM NO.	OUNTINY 2		DESCRIPTIO				PRICE	1 Olac And
	ATTEMPT OF THE PARTY OF THE PAR		INLINED DRUMS		and the second s	3	5.00/ea	\$145.00
1	29 es.	44424	ing the same of the section of the		WHENETHOW		1.50/es	\$ 82.50
2	55" ea	SALE OF SCRAP	LINED DRUMS				TAL	\$227.50
*	The second secon		SALO STAGE	ining -ny	** 150 CHC-	gla 7	2 485	e e e e e e e e e e e e e e e e e e e
		A CONTRACTOR OF THE PROPERTY O					i de e de eggi. Edgi i degli di Sija	
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		NOWE WAKE CHE	k payable to: 1	REYNOLDS ME	TALS CO			
				2425 WHIPPI HAYWARD; † C	D DOND			n
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					TOTAL CONTRACT			
*		RECIEVED BY	702 /1c	مستندح				* * * * * * * * * * * * * * * * * * * *
× =======	SON FOR SHIPMENT		CARRIER			₹	HIPPED	
	LE OF SCRAP I	BIMS THE LEAD OF THE PARTY	CUSTON	ERS TRUCK		BILLO	1-31-82 LADING NO.	, , , , , , , , , , , , , , , , , , ,
DA				ACCOUNT NO		IOVAI	CE NO.	4.43
	CIAL INSTRUCTIONS	rau main it					CE DATE	en en
CC	MPLETE UPON S	HIPMINT	OR.					RECG. REPO
APF	PROVED BY (PURCH. AG	ENT)	The second secon	A CONTRACTOR OF	A CONTRACTOR OF THE CONTRACTOR	DEBIT	MEMO NO:	RECO. REP
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3	And the same of th	ANCISCO CAN PAS	N	LPANI		MISCELLANEOUS SI	IPPING ORD
5	2425.W	HIPPLE ROAD D. CA: 94540				.s.o. No. .s.o. No	PATE : #:-6
AY 212	O, RETURNED TO, PURC AREA DRUM SAL THOMAS AVE	HASED FROM ES	SHIP TO			ERMS	OUR P.O. NO. N/A.
A	FRANCISCO, CA	94124				O.B. KNEXTXTK HIP VIA CUST TRUCK EQUESTING DEPT	PREPAID COLLECT
TEM			The state of the s			UNIT PRICE	T TOTAL AMC
NO.	QUANTITY		DESCRIPT	A STATE OF THE PARTY OF THE PAR		***************************************	manum varanenannumum
1	4 ea 1	SALE OF SCRAP I				\$5.00/ea; \$1,50/ea	\$20.00 \$64.50
						TOTAL	\$84.50
		ÇÎRATEXE	CXBARGH XBODGAKK	AND SECTION OF THE SECOND			
		NOTE: MAKE CHE	CHECK NUMBER	REYNOLDS ME		?	5 ° 8'
				2425 WHIPPLI HAYWARD, CA			
was see		RECIEVED BY	LE FI	gul			# 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
EASO	N FOR SHIPMENT		CARRIER			ATE SHIPPED	i into
SAL	e of scrap dr	MS	сизтом	SRS TRUCK		3-1-83 IIL OF LADING NO. 025893	
PECIA	L INSTRUCTIONS			ACCOUNT NO.	AMOUNT	HVOICE NO.	* * * * *
	PLETE UPON SHI ASE ISSUE INVO		DR.			NVOICE DATE	
24	DAUGHERTY	100				DEBIT MEMO NO.	RECG, REPORT N
322-19	I (I) (NEV. 11-03)					oll nor a remit	



BAY AREA DRUM CO. INC.

MS.O. NO., 3. 65 175 CNK-54-6975	8-30-8
CUST. ORDER NO.	OUR P.O. N
TERMS	CREDIT.
8.P.	

SOLD TO, RETURNED TO, PURCHASED FROM COMPLETE 1212 THOMAS AVE BAN FRANCISCO, CA. 94124 CUST TRUCK REQUESTING DEPT. \$5.00/ea and the second \$1.50/ea \$ 60.0 TOPAL

((PAID BY CHECK NUMBER 3869)))

	CUSTOMER TRUCK	DATE SHIPPED 8-2-83	
SALE OF SCRAP DRUMS	The second secon	BILL OF LADING NO. 027819	*
SPECIAL INSTRUCTIONS COMPLETE UPON SHIPMENT	ACCOUNT NO. AMOUNT	INVOICE NO.	
PLEASE ISSUE INVOICE	DR.	INVOICE DATE	
APPROVED BY (PURCH_AGENT)		DEBIT MEMO NO.	RECG. REPOR

MUYNOLDS METALE COMPANY 2425 WHIPPLE ROAD MISCELLANEOUS SHIPPING ORDER 2425 WHIPPLE ROAD HAYWARD, CA. 94540 11-29-84 CNK-54-7628 SOLD TO, RETURNED TO, PURCHASED FROM CUST. ORDER NO. M/A TEL EXX .. SAHE DAY AREA DRUM 100 " TYA BANOBT SISL 1212 THOMAS AVE PREPAID (SA) CUST X COLLECT REQUESTING DEPT. COLANTITY TO TOTAL AMOUNT SALE OF EMPTY NOW DEPOSIT DRING TO TBD 150. NOTE: MAKE CHECK PAYABLE TO: REYNOLDS METALS CO 2425 WHIPPLE ROAD HAYVARD CA. 94540 CUSTOMERS TRUCK DATE SHIPPED 11-29-84 SALE OF SCRAP DRUMS BILL OF LADING NO. 031997 SPECIAL INSTRUCTIONS INVOICE NO. MSO TO REMAIN OPEN UNTIL RECEIPT OF PAYMENT INVOICE DATE

DEBIT MEMO NO.

RECG. REPORT NO.

	der must be impay titled in Carbon, a	nd relevan		. 4	· · · · · · · · · · · · · · · · · · ·			ON CN	ALL FRE	ADING NUMBER	
NAME OF CARRIER	*		**************************************			CARRIER NUM	IBER				
JAPONER T	•	e mugamanan	**************************************		**************************************	<u> </u>	· · · · · · · · · · · · · · · · · · ·	AB	6	03199	
4.99	RECEIVE, swij		VEAR SONTH	F A	ET ON THE GOT AT TH ROM CAN DIV	4 1 1 1	upping Order,	EIL.	L IN	DUPLICATE	
AT Hayward, (CA	40	84 11	20	EVUNING M	ETALE CO	. ANC.)	اجا	2 Mode	Consignae Dallier	
the property described below. If an about the contract the sound the contract the delication. If of			/Red de line state to be a	arater it bees arater it bees	couple whereon rate lease-or of the preprint or controlly serves, so to	nd, care greet and de- prior the conseptil age a dect comme of all a	strat to indicate them, to out to come to the source place s has all and assume to the til	ب الا معداد			
delitory of said destination, If or any portion of said make in det and conditions of the senterm D plingles control narrow stempthicks	parameter from the first of Ladine at	in thick top my	terrolog a gl et gra pr a Uniterm Franget Classe	50-5 21090FF. 1 Filosop to prioti	that energ service to be the date hereof of	personal received the q a mr, or a rec	shell be subject to an the le- mater attractions, or 12, or the		P	E 1 1	
					· · · · · · · · · · · · · · · · · · ·			-	lading, If the ship consigned without n	oment is to be deliver acquire em the pone-are	
Elitypes territy collect Gal Sus bandpartenad of the programm	the to feather with all the serms I and the serd tyring and conditions	and condition of remain of	ne of the send ten or the roof to by the chapper see	dog, including to strapted for hims	lates on the back Trans and and his sought.	I, and terms to the cost	affection of Suff areen pres	erre the co	rangnor sheë brijn e carrier sheë not n	the following statement nake dervery of this shi fraight and all other is:	
CONSIGNED TO	This man was a second	mamodás D. A. Citto (1990)	***************************************	**************************************			· ·	Nu cha		haden man on Anne a	
BAY ARKA DI	RUM	·				DMAS AVE	DESTINATION COD		я.м.		
DESTINATION BAN FRANCIS	200					CA	94124		Signature of Charges are to be charges are to be charges.	prepaid, write at short	
ROUTE	300 }			Killation & or & Originalism	***************************************	· ·	<u> </u>		TOTAL TRANSPORT	Wb collect	
CUSTOMER TI	NUCK		·					Access to expe	y in propagment of scorbed hereon.	the charges on the pre-	
ROUTE CODES									er Cashier		
EREA CUST	- FERICI	C.BHTI/	ALS AND NUMBE			SEAL NUMBER	z		a signature here	acknowledges only th	
DELIVERING CAPACER		, € ~ Here	(L) AFED 1701	n .		JEAL NOW.	\$	-	prepaid.)		
NUMBER CARS	† The description on	id weight	indicated on th	is Bill of L	ading are correc	I, + Skippe	r's imprint in how of six		of the bill of leding	appeared by the leter	
	subject to verticat TION BUREAU accor	ion by tribing to a	he GOVERNING agreement	l WEIGHT	G AND INSPEC	" If the o	mmerce Communica. T hipment moves between ding shell mass whether	n two parts by a	p corrier by water, if	to law requires that the	
No. 7ype	DESCRIPTION OF ARTICLES		*WEIGHT Sub. to Cor.)	RATE	FREIGHT CHARGE	MOTE-Who	writing the spreed or ductored value of		value, atoppers are required to state specifically in the property. This agreed or declared value of the		
	Cans. Aluminum		Plan to trong		A11-1-7	Perpetty of	hereby specifically states	d by the empo-	to be not	* 3.	
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	Aluminum Scrap 40 214 30								46	* * *	
e en	35 912 43	_		***************************************		1	· ·	* *	*	3.	
3 ²⁰ 423 €	PTEEL DRING		3,760	. money manyons,				*		**	
							4.			# A	
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SAN PRANCISCO CAN P. 2425 WHIPPLE ROAD HAYVAND, CA. 94540	ETALS COMPANY	MISCELLANEC	DUS SHIPPING ORDER
	MS 5 NO. CMY:-54-762	8 11-29-84	
SOLD TO, RETURNED TO, PURCHASED FROM	SHIP TO	CUS" CRDER NO	OUR P.O. NO.
BAY AREA DRUM 1212 TEOMAS AVE	XXX SAVE	TERMS	T/A CREDIT
SAN PRANCISCO, CA. 94124		F.O. 8	
Maria de la companya del companya de la companya de la companya del companya de la companya de l			E.P.
Say 1	*	SHIP VIA	☐ PREPAID
Kir Miller vig at the end of the control of the con		RECUESTING DEPT.	CCOULECT
TEM QUANTITY GUANTITY	DESCRIPTION	UNIT	TOTAL AMOUNT
150	TON DEPOSIT DRUK	780	
BOTE: NAME CHE	CK PAYABLE TO: RETROLDS METALS CO 2425 WHIPPLE ROAD HAYWARD, CA. 94540	· A Carlot Mark A.	
/ RECEIVED	BY (N. 10) = 14		
SON POR SHPMENT	CARR	DATE SHIPPED	
LE OF SCRAP DRUPES	CUSTOMERS TRUCK	11-29-84 BILL C" LADING NO.	

8. IMAC

APPROVED BY (PURCH, AGENT

4 537-191 (III pierv. 31-45)



007603

RECG. MEPORT NO

DEBI" WEMO HO.